

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA :

v. :

ZACHARY EASTERLY :

MAGISTRATE NO. 22-M-1375

**GOVERNMENT’S SECOND UNOPPOSED MOTION FOR CONTINUANCE
PURSUANT TO TITLE 18, UNITED STATES CODE, SECTION 3161(h)(7)(A)**

The United States of America, by and through its attorneys, Jacqueline C. Romero, United States Attorney for the Eastern District of Pennsylvania, and Vineet Gauri, Assistant United States Attorney, moves for a second thirty-day continuance of the time within which an Indictment or Information must be filed in this case, and in support of this motion states as follows:

1. On August 30, 2022, a Complaint was filed by the United States Attorney’s Office charging defendant Zachary Easterly with assault on a federal officer, in violation of Title 18, United States Code, Section 111(a)(1). That same day, the defendant was arrested on the Complaint.
2. On September 1, the defendant made his initial appearance on the Complaint.
3. The Speedy Trial Act, 18 U.S.C. § 3161 et seq., requires that an Indictment or Information be filed within thirty days from the date on which the defendant was arrested, in this case by September 29, 2022. 18 U.S.C. § 3161(b).
4. On September 25, 2022, the government filed its first unopposed motion for continuance of the time within which to file an Indictment or Information in this case. That same day, the Honorable Elizabeth T. Hey, United States Magistrate Judge, ordered that the time in which an Indictment or Information must be filed in this case was continued for a period of thirty

additional days, until October 29, 2022.

5. In this particular case, the government estimates that it requires the continuance requested here in order to complete its investigation and the presentation of evidence to a grand jury. Meanwhile, the government and the defendant are continuing discussions to possibly resolve this matter through a non-trial disposition.

5. Counsel for the defendant, Douglas P. Earl, has represented that the defendant does not oppose the government's second request for a thirty-day continuance.

WHEREFORE, for the above reasons, it is respectfully submitted that the ends of justice will be served best by the granting of a second continuance of thirty days of the time within which to file an Indictment or Information in this case, that is, until November 28, 2022.

Respectfully submitted,

JACQUELINE C. ROMERO
United States Attorney

/s Vineet Gauri

Vineet Gauri
Assistant United States Attorney

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ORDER

AND NOW, this 28th day of October, 2022, the Court finds that the defendant and the government are engaging in discussions which may affect the charges against the defendant and that the defendant does not oppose the government's second motion for continuance. In addition, the government estimates that it requires the continuance requested here in order to complete its investigation and the presentation of evidence to a grand jury. The Court further finds that these reasons cause the ends of justice to best be served by granting a continuance in this matter, and that these reasons outweigh the interests of the public and the defendant in a speedy trial.

WHEREFORE, in accordance with Title 18, United States Code, Section(h)(7)(A), it is hereby ORDERED that the time in which an Indictment or Information must be filed in the above action is continued for a period of thirty additional days, until November 28, 2022.

BY THE COURT:

/s/ Carol Sandra Moore Wells
HONORABLE CAROL S. WELLS
United States Magistrate Judge

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Government's Second Unopposed Motion for Continuance Pursuant to Title 18, United States Code, Section 3161(h)(7)(A) has been served by email upon the following:

Douglas P. Earl, Esquire
1015 Chestnut Street, Suite 902
Philadelphia, PA 19107
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/s Vineet Gauri
Vineet Gauri
Assistant United States Attorney

DATE: October 28, 2022